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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
11/19/2018 at 08:00:00 AM
Clerk of the Superior Court
By Jessica Pascual, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO – CENTRAL DIVISION

JANE DOE NOS. 1-14, inclusive,
individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business
organization, form unknown; MICHAEL J.
PRATT, an individual; ANDRE GARCIA,
an individual; MATTHEW WOLFE, an
individual; BLL MEDIA, INC., a California
corporation; BLL MEDIA HOLDINGS,
LLC, a Nevada limited liability company;
DOMI PUBLICATIONS, LLC, a Nevada
limited liability company; EG
PUBLICATIONS, INC., a California
corporation; MIM MEDIA, LLC, a
California limited liability company;
BUBBLEGUM FILMS, INC., a business
organization, form unknown; OH WELL
MEDIA LIMITED, a business organization,
form unknown; MERRO MEDIA, INC., a
California corporation; MERRO MEDIA
HOLDINGS, LLC, a Nevada limited liability
company; and ROES 1 - 500, inclusive,

Defendants.

LEAD CASE:
Case No. 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:
Case No. 37-2017-00043712-CU-FR-CTL
Case No. 37-2017-00033321-CU-FR-CTL

**DECLARATION OF MATTHEW
WOLFE IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY ADJUDICATION**

Date: February 1, 2019
Time: 9:00 a.m.
Judge: Hon. Joel R. Wohlfeil
Dept.: C-73

Complaint Filed: June 2, 2016
Trial Date: March 8, 2019

[IMAGED FILE]

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1 I, Matthew Wolfe, declare:

2 1. I am over eighteen years of age. I am a defendant in this case. I have personal knowledge
3 of the facts stated in this declaration and, if called as a witness, could testify competently about
4 them.

5 2. I testified as the Person Most Knowledgeable for BLL Media, Inc. at its deposition in this
6 case. However, I am not and have never been an employee of BLL Media, Inc., nor have I ever
7 had any ownership interest in BLL Media, Inc.

8 3. BLL Media, Inc. owns, operates, and controls www.girlsdoporn.com, the website on
9 which Plaintiffs allege their videos were published. I have never operated, owned, or controlled
10 www.girlsdoporn.com. I have never posted content on www.girlsdoporn.com.

11 4. M1M Media, Inc. owns, operates, and controls www.girlsdotoys.com, a website on which
12 Does Nos. 1, 2, 5, 9, 12, 14, and 22 allege their videos were published.

13 5. I have never personally distributed the videos referenced in Plaintiffs' operative
14 complaints.

15 6. I have never used any of the videos referenced in Plaintiffs' operative complaints for my
16 personal commercial benefit.

17 7. I have never personally received any monies or commercial benefit from any of the
18 videos referenced in Plaintiffs' operative complaints.

19 8. I have never entered into a contract with any of the Plaintiffs.

20 9. I maintain my own separate bank account. I do not share bank accounts with any of the
21 named defendants. My personal income is deposited into my bank account. No other defendant
22 deposits monies into my bank account to shield its income. Each entity defendant in which I
23 have ownership interest has its own separate bank account.

24 10. I have never held myself out as being liable for the debts of any of the other defendants.

25 11. The only named defendant entities in which I have ownership interest are Merro Media,
26 Inc., Merro Media Holdings, LLC, and M1M Media, Inc. I am not an officer, director, member,
27 manager, or employee of any named entity defendants other than Merro Media, Inc., Merro
28 Media Holdings, LLC, and M1M Media, Inc.

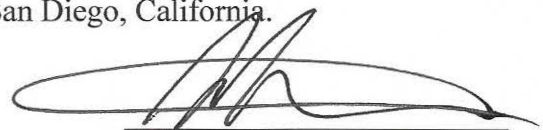
1 12. Merro Media, Inc., Merro Media Holdings, LLC, and M1M Media, Inc. maintain their
2 own corporate formalities.

3 13. Merro Media, Inc., Merro Media Holdings, LLC, and M1M Media, Inc. are each
4 adequately capitalized. Merro Media, Inc., Merro Media Holdings, LLC, and M1M Media, Inc.
5 have sufficient capital to pay all reasonably anticipated liabilities.

6 14. Merro Media, Inc., Merro Media Holdings, LLC, and M1M Media, Inc. are not mere
7 shell entities for the affairs of any of the other named defendants.

8
9 I declare under penalty of perjury under the laws of the State of California that the information
10 contained in this declaration is true and correct to the best of my knowledge.

11 Executed this 16th day of November, 2018 at San Diego, California.

12
13 
14 Matthew Wolfe